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Attorneys for Defendant
Experian Information Solutions, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHAEL CALKINS,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,
LLC, a foreign limited liability company; and
EXPERIAN INFORMATION SERVICES,
INC.

Defendants.

Case No. 2:16-cv-02628-RFB-VCF

**STIPULATION TO CONTINUE
DISPOSITIVE MOTION DEADLINE AS
TO EXPERIAN INFORMATION
SOLUTIONS, INC.**

[FIFTH REQUEST]

Complaint filed: November 15, 2016

Plaintiff Michael Calkins (“Plaintiff”) and Defendants Experian Information Solutions, Inc. (“Experian”) and Portfolio Recovery Associates, LLC (“Portfolio”) by and through their respective counsel, hereby move the Court to request a 14-day extension of the dispositive motion deadline currently set for December 4, 2017 as to Experian.¹

Good cause exists to grant this extension as Defendant Experian is currently engaged in settlement discussions with Plaintiff which are aimed at resolving this case as to Experian in full. However, Plaintiff and Experian have been unable to engage in settlement discussions due to

¹ The parties previously entered into two stipulations to extend discovery and dispositive motion deadlines. (ECF Nos. 21 and 23). Thereafter, at the hearing on Portfolio’s motion for protective order held on October 5, 2017, the Court ordered the dispositive motion deadline be extended to November 20, 2017. On November 15, 2017, the Parties filed a Stipulation to Extend to the Dispositive Motion deadline as to Experian until December 4, 2017. Thus, the parties are treating this as the Fifth Request to extend the dispositive motion deadline.

1 unforeseen circumstances with Plaintiff's counsel.² An extension of the dispositive motion
2 deadline will give the parties additional time to pursue all settlement possibilities before incurring
3 the costs associated with preparing dispositive motions.

4 As such, Plaintiff, Experian, and Portfolio respectfully request a 14-day extension of the
5 dispositive motion deadline for Experian making the new deadline December 18, 2017.

6 Dated this 1st day of December 2017.

7 THE LAW OFFICE OF VERNON
8 NELSON

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19 *Attorneys for Portfolio Recovery Associates,*
20 *LLC*

21 **IT IS SO ORDERED.**

22
23 Dated: 12-4-2017



HONORABLE CAM FERENBACH
United States Magistrate Judge

24
25 ² On November 27, 2017, the Parties file a Stipulation to Extend the time allowed for
26 Plaintiff to file an Opposition to Defendant Portfolio Recovery Associate's Motion for Summary
27 Judgment until December 4, 2017, which indicates Plaintiff's counsel has not been in the office
28 due to a family emergency and therefore unable to attend to and respond to the Motion for
Summary Judgment. (ECF No. 39). Similarly, Plaintiff's counsel has been unable to engage in
settlement discussions as intended.